

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al.,)
)
Plaintiffs,)
)
v.) Civil Action No. 05-823-*** (MPT)
)
STANLEY TAYLOR, et al.,)
)
Defendants.)

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2007 OCT -1 AM 10:45

CERTIFICATION

At Wilmington this 1st day of October, 2007;

I, Nancy Rebeschini, Esquire, pro se law clerk, and designated officer for depositions upon written questions held before me on September 25, 2007, do here by certify that:

1. The deposition of Michael Knight was held on September 25, 2007, at the J. Caleb Boggs Federal Building, Wilmington, Delaware.

2. On that same date, Michael Knight declared before me, an individual authorized to administer oaths, that his written answers were true and correct.

3. I read aloud each and every deposition question submitted by plaintiff, George A. Jackson, for deponent, Michael Knight.

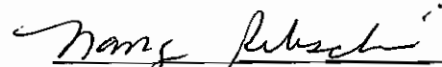
4. I personally observed deponent, Michael Knight, answer in writing, the deposition questions.

5. A true and correct copy of the written questions filed by plaintiff, the original written answers of deponent, and written original objections made by his counsel are attached hereto and are filed with the court, and copies shall be served upon the parties

and the deponents.

I, Nancy Rebeschini, certify under penalty of perjury that the foregoing is true and correct.

Executed this 1st day of October, 2007.

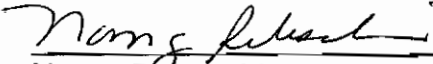


Nancy Rebeschini, Esquire, Designated
Officer

CERTIFICATE OF SERVICE

I hereby certify that on October / , 2007, I caused to be electronically filed the attached Certification with the Clerk of the Court using CM/ECF, which will send notification of such filing to Eileen Kelly, Esquire, counsel for defendants. I further certify I caused a true and correct copy of the attached Certification to be served via U.S. mail on plaintiffs: George A. Jackson, SBI No. 171250, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Darus Young, SBI No. 282852, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Charles Blizzard, SBI No. 166670, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Frank Williams, SBI No. 261867, Sussex Correctional Institution. P. O. Box 500, Georgetown, DE 19947; Roy R. Williamson, SBI No. 291856, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Anthony Morris, SBI No. 300363, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Carl Walker, SBI No. 173378, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Samuel Jones, SBI No. 465297, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Darwin A. Savage, SBI No. 232561, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Adrain Wright, SBI NO. 169921, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Gilbert Williams, SBI No. 137575, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Charles B. Sanders, SBI No. 160428, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Joseph White, SBI No. 082985, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Timothy L. Malloy, SBI No. 171278, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Howard Parker,

SBI No. 165324, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Kevin Spivey, SBI No. 258693, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; James Johnson, SBI No. 155123, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Vernon Truitt, SBI No. 188191, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Roderick Brown, SBI No. 315954, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; José Serpa, SBI No. 350322, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Roger Thomas, SBI No. 292590, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; John F. Davis, SBI No. 263753, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Lawrence B. Dickens, SBI No. 124570, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Eldon Potts, SBI No. 211193, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; Jerome Green, SBI No. 147772, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947; and Rique Reynolds, SBI No. 266486, Sussex Correctional Institution, P. O. Box 500, Georgetown, DE 19947.


Nancy Rebeschini, Esquire,
Designated Officer

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON, et al.,
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C.A. No. 05-823-***
JURY TRIAL REQUESTED

PLAINTIFF GEORGE A. JACKSON'S WRITTEN DEPOSITIONS
TO DEPOSE DEFENDANT MICHAEL KNIGHT

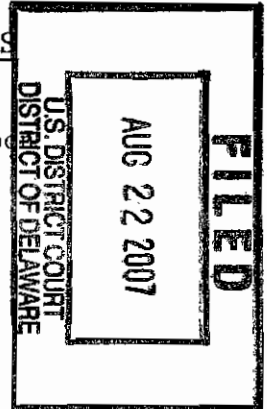
Plaintiff George A. Jackson, pro se, hereby depose defendant upon
Order of the Court:

GENERAL OBJECTIONS

1. Plaintiff objects to the deposing of the defendants to the
extent of written depositions. Just for the record.

WRITTEN DEPOSITIONS

1. How long have you been employed with the Delaware Department of Corrections?
2. Are you under the influence of any medication?
3. Have you had a chance to review the Amended Complaint, your "Response to the Plaintiffs' Interrogatories, and any previous statements you given to defendants' counsel or any one else in connection with this case before coming here today?
4. Have you had a chance to meet and discuss the case with defendants' counsel?
5. Do you realize that you are under oath, just as if you were at trial testifying?
6. Is there any reason you can't give your best testimony today?
7. State your job title, and explain your general duties.



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8. Prior to December 1, 2005, has the S.C.I. main kitchen ever received any Certificate of Inspection from the Occupational Safety and Health Administration (OSHA). If yes, state the date/year.

9. In your "Response no. 2 to Plaintiffs' Interrogatories," you alleged "periodic prevention maintenance records were also discussed and reviewed to make sure everything is up to date." Name those persons, including yourself, who discussed and reviewed those records.

10. Does your office maintained certification records of S.C.I. food service inspection, containing the name of the person who performed the inspection and serial number, or other identifier of the kitchen equipment?

11. In your "Response no. 4 to Plaintiffs' Interrogatories," you alleged "... professional steam cleaning vendor Going Clean steam cleans the system." Did "Going Clean" ever steam clean the S.C.I. main kitchen prior to August 9, 2005?

12. How often in one (1) year do you personally inspect the S.C.I. main kitchen? When was your last day/date at the S.C.I. main kitchen,

13. Have you ever recorded the air temperature on the "old" side of kitchen, and compared to the "new" side of area of the S.C.I. kitchen during the summer months? If yes, what was the results?

14. Have you personally instructed or order S.C.I food service employees not to allow inmate kitchen workers to not be allowed to wear DOC issue hats and jackets during extreme cold winter days in the S.C.I main kitchen.

15. During the summer when temperatures rise and/or exceed 100 degrees. Inmate kitchen workers are provided with regular breaks and encouraged to drink plenty of liquids on these hot days. Are you aware there is only one (1) toilet seat for 22 to 25 inmates use while at work at the S.C.I main kitchen.

Page 1

Michael Knight 9-25-07

①. 21 years

② NO

③ I don't understand question

④ NO

⑤ YES

⑥ NO

⑦ C/O Youth Rehab
Food Service Administrator

I oversee statewide Food Service operations for the
Department of Corrections.

⑧. I DO NOT KNOW

⑨ I DO NOT understand question.

⑩ NO

⑪ I DO NOT understand question.

⑫. I DO NOT Recall

⑬ NO

⑭ Public Health standards require that Jackets & Hats are
not be worn in a Food Preparation/Production area.

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Michael Knift 9-25-08

(15). I AM AWARE of AN inmate bathroom and
an officers bathroom in the Kitchen.

Michael Knift

Michael Knight 9/25/07

Eileen Kelly, Esq., DAG

3. Objection

4. Objection. Instruct witness not to provide any information regarding any conversation with me (Eileen Kelly) or Catherine Damavandi.

9. ~~3~~ Objection. Witness hasn't been provided with interrogatories here so hasn't had opportunity to review question.

11. Objection. Witness hasn't been provided with interrogatories here so hasn't had the opportunity to review the question.

15. Objection.

Eileen Kelly, DAD 9/25/07